

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IRON WORKERS' MID-AMERICA	)	
PENSION PLAN, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	CIVIL ACTION
	)	
vs.	)	NO. 12 C 0042
	)	
J & D ERECTORS, INC., an Illinois	)	JUDGE REBECCA R. PALLMEYER
corporation,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF DEFAULT AND JUDGMENT**

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, J & D ERECTORS, INC., an Illinois corporation, in the total amount of \$25,974.39, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,455.75.

On January 8, 2012, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to Philip Saineghi, the corporation's president) at the registered office of record (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on January 30, 2012. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Patrick N. Ryan

**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 9th day of February 2012:

Ms. Josephine M. Saineghi, Registered Agent  
J & D Erectors, Inc.  
7616 West Berwyn Avenue  
Chicago, IL 60656

/s/ Patrick N. Ryan \_\_\_\_\_

Patrick N. Ryan  
Attorney for Plaintiffs  
BAUM SIGMAN AUERBACH & NEUMAN, LTD.  
200 West Adams Street, Suite 2200  
Chicago, IL 60606-5231  
Bar No.: 6278364  
Telephone: (312) 236-4316  
Facsimile: (312) 236-0241  
E-Mail: [pryan@baumsigman.com](mailto:pryan@baumsigman.com)